IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

In re:		Case No. 15-10246 MCF
WILLIAM ORTIZ MEDINA SARA RAQUEL SEPULVEDA		Chapter 13
Debtor (s)	/	
	/	

MOTION FOR TIME EXTENSION

TO THE HONORABLE COURT

DEBTOR, by and through the undersigned attorney informs to this Honorable Court the following:

- 1. On 7/12/2017, the Debtor filed Objection to POC's 3 & 4.
- 2. On 8/11/2017, Creditor, Midland Funding LLC filed response / opposition to Debtors Objection to POC's 3 & 4.
- 3. Debtors very respectfully inform their intention to file Sur-reply to Creditor's response / opposition.
- 4. Therefore, Debtor very respectfully request a 30 days' time extension to file Sur reply.

WHEREFORE, the Debtors respectfully request that this Honorable Court take notice of the information herewith and to grant debtor's request.

CERTIFICATE OF SERVICE: I hereby certify that on this same date the foregoing motion was filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all CM/ECF participants, the USA Trustee and the Chapter 13 Trustee.

RESPECTULLY SUBMITTED

In San Juan, Puerto Rico this 7th day of October 2017

/s/ Jesus E. Batista Sanchez, Esq. The Batista Law Group, PSC Jesus E. Batista Sanchez No. 227014 Attorney for Debtors 420 Ave. Juan Ponce de Leon Suite 901 San Juan, P.R. 00918 Telephone: (787) 303-0325

Facsimile: (787) 777-1589

E-mail: jesus.batista@batistalawgroup.com